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Of Counsel:
MARSHALL A. MINTZ

May 17, 2022

Hon. Vernon S. Broderick
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Room 415
New York, NY 10007

Re: United States v. Franzone
21 CR 446 (VSB)

Dear Judge Broderick,

We represent Defendant Andrew Franzone (“Franzone”) in the above-captioned case. Mr. Franzone is on a curfew enforced using location monitoring. ECF # 19. We write to respectfully request that his bail conditions be modified to terminate the curfew and location monitoring.

This request is precipitated by Mr. Franzone’s father [REDACTED]. See Ex. A Letter from Father’s Doctor, which we are submitting for filing under seal given it contains information requiring caution.

Mr. Franzone has been subject to location monitoring since February. To our knowledge, there have been no issues as far as his compliance with the terms of his pretrial release.

We have conferred with Mr. Franzone’s Pretrial Services Officer, who has advised that Pretrial Services has no objection to this application. Defense counsel has also communicated with the Government, and we have been advised that the U.S. Attorney’s Office takes no position on the application to end Mr. Franzone’s curfew.

Wherefore, we respectfully request that the Court modify Mr. Franzone’s terms of pretrial release by removing the condition of curfew with location monitoring.

Thank you for your consideration.

Respectfully,

A handwritten signature in black ink, appearing to read 'J. Corozzo', written over a horizontal line.

Joseph R. Corozzo, Esq.

Angela D. Lipsman, Esq.

cc: AUSA Kiersten Fletcher (via email)
Pretrial Services Officer Francesca Piperato (via email)